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Attorneys for Defendant
Recover Innovations, Inc. d/b/a Recover Tactical

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

CAA Industries, Ltd.,

Plaintiff,

v.

Recover Innovations, Inc. d/b/a Recover
Tactical,
Defendant.

Case No. 2:22-cv-00581-GMN-EJY

UNOPPOSED MOTION TO EXTEND
DEADLINE FOR DEFENDANT'S
RESPONSE TO THE SECOND
AMENDED COMPLAINT

(FIRST REQUEST)

Defendant Recover Innovations, Inc. d/b/a Recover Tactical, by and through undersigned counsel and with no opposition from Plaintiff CAA Industries, Ltd., hereby respectfully requests that the Court grant Defendant an extension of one (1) week to respond to the Second Amended Complaint (Doc. 50 filed June 16, 2023, Notice of Errata at Doc. 51 filed June 26, 2023.) Pursuant to LR IA 6-1, this is the first request for extension of time.

As indicated above, the Second Amended Complaint was filed on June 16, 2023. Since then, the undersigned counsel has been out of the office on three (3) business days and unable to compensate for this absence on weekends, all of the foregoing due to time of year, with the undersigned's youngest daughter in the middle of the busy summer season of competitive basketball

(AAU girls' basketball), with the undersigned committed to family matters for the entirety of two three-day periods. Moreover, the Notice of Errata filed on June 26, 2023, reflected a change in the identity of an Israeli entity key to Plaintiff's amended allegations, requiring additional research in order to formulate a proper response. The one-week extension comprised of four business days in light of the Independence Day Holiday next week would provide the necessary time for the undersigned to answer or otherwise respond to the Second Amended Complaint. This short request is sought in good faith and not pursued for undue delay. No further extensions will be sought.

For the foregoing reasons, Defendant respectfully requests the Court grant this Motion.

Respectfully Submitted this 28th day of June, 2023.

Sherman Law, PLLC

By: /s/Kenneth M. Motlenich-Salas

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and

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Attorneys for Defendant Recover Innovations, Inc.

IT IS SO ORDERED.

IT IS FURTHER ORDERED that Defendant has until **July 7, 2023** to respond to Plaintiff's Second Amended Complaint.


UNITED STATES MAGISTRATE JUDGE

DATED: June 28, 2023

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